

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

**PLAINTIFF EON CORP. IP HOLDINGS, LLC'S ANSWER TO
ALCATEL-LUCENT USA INC.'S COUNTERCLAIMS
TO PLAINTIFF'S FOURTH AMENDED COMPLAINT**

Plaintiff and counterclaim defendant EON Corp. IP Holdings, LLC (“Plaintiff” or “EON”), through undersigned counsel files this amended answer to defendant Alcatel-Lucent USA Inc.’s (“Defendant” or “Alcatel”) counterclaims (Doc. No. 413) as follows:

1. EON admits the allegation of Paragraph 107 that this Court has jurisdiction over the asserted counterclaims.
2. EON admits to Paragraph 108.
3. EON admits that it has submitted to personal jurisdiction in this Court in claims arising in this suit. EON denies the remaining allegations of to Paragraph 109.

ALCATEL'S FIRST COUNT
(Non-Infringement)

4. EON admits to Paragraph 110.
5. EON denies the allegations of Paragraph 111.
6. EON denies Alcatel is entitled to the relief it seeks in Paragraph 112.

ALCATEL'S SECOND COUNT
(Invalidity)

7. EON admits to Paragraph 113.
8. EON denies the allegations of Paragraph 114.
9. EON denies Alcatel is entitled to the relief it seeks in Paragraph 115.

PRAYER FOR RELIEF

Paragraphs A through D set forth the statement of relief requested by Alcatel, to which no response is required. To the extent any response is required, EON denies that Alcatel is entitled to any of the requested relief and denies any allegations contained therein as they relate to EON. To the extent Paragraphs A through D contain factual allegations, EON denies them to the extent they relate to EON.

Dated: September 1, 2011.

Respectfully submitted,

/s/ Craig S. Jepson
Daniel Scardino
Texas State Bar No. 24033165
Cabrach J. Connor
Texas State Bar No. 24036390
Craig S. Jepson
Texas State Bar No. 24061364
Jeffery R. Johnson
Texas State Bar No. 24048572
REED & SCARDINO L.L.P.
301 Congress Avenue, Suite 1250
Austin, Texas 78701
Tel.: (512) 474-2449
Fax: (512) 474-2622
dscardino@reedscardino.com

cconnor@reedscardino.com
cjepson@reedscardino.com
jjohnson@reedscardino.com

Deron R. Dacus
Texas State Bar No. 00790553
RAMEY & FLOCK, P.C.
100 E. Ferguson, Suite 500
Tyler, Texas 75702
Tel.: (903) 597-3301
Fax: (903) 597-2413
derond@rameyflock.com

ATTORNEYS FOR PLAINTIFF
EON CORP. IP HOLDINGS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2011, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Eastern District of Texas, using the electronic case files system of the court. The electronic case files system sent a "Notice of Electronic Filing" to individuals who have consented in writing to accept this Notice as service of this document by electronic means, all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by first class mail today, September 1, 2011.

/s/ Craig S. Jepson
Craig S. Jepson